



Smart Card  
Alliance



# Smart Card Alliance Comments: Draft FIPS 201-2

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## Comments: Documentation gaps

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# Standards, document gaps

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**Line 169 - Effective date: "This standard is effective immediately."**

**The standard should not be implemented until other supporting documents are updated (e.g., SP 800-73, SP800-76, SP 800-78, FIPS 140-3, GSA APL and test specifications, SP 800-116).**

**Suggestion:**

**Revise with timeline that reflects changes to supporting documents. OMB should provide effective date**



# Standards, document gaps

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## Line 251- Change Management:

**“Every new revision of this standard introduces refinements and changes that may impact existing implementations.”**

## Suggestion:

**Add a sentence, that a "migration document" will be issued allowing to minimize the impact of such changes.**



# Standards, document gaps

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**Line 468 - Card Issuance requirements:  
Minimum accuracy requirements for the  
biometric match are specified in [SP 800-76].**

## **Suggestion:**

**It is assumed that NIST will issue guidance that indicates that the requirement for iris recognition, as an alternative to fingerprint matching, will be effective following an update to SP 800-76.**



# Standards, document gaps

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## **Line1005 - Optional items printed on card:**

***Zone 15F—Color-Coding for Employee Affiliation. The following color scheme shall be used for the noted categories:***

**Blue—foreign nationals**

**Red—emergency response officials**

**Green—contractors.**

**Suggestion: 1) Add language to FIPS 201-2 Section 4.4.1.3 to more accurately identify which color codes have preference in situations where a PIV card holder meets more than one of the criteria for the optional color coding;**

**2) Remove the use of Red for Emergency Response Officials designation and relegate this information to the Zone 12F footer as currently specified in the draft**



# Standards, document gaps

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## **Line 1018 - Optional printed information, Photo border:**

**“The border may be a solid or patterned line. For solid and patterned lines, red shall be reserved for emergency response officials, blue for foreign nationals, and green for contractors. All other colors may be used at the department or agency’s discretion”.**

**Suggestion: The border may be a solid or patterned line. For solid and patterned lines, blue shall be reserved for foreign nationals and green for contractors. Foreign National color-coding has precedence over Government Employee and Contractor color-coding. All other colors may be used at the department or agency’s discretion.**



## Standards, document gaps

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**Line 1161- Card Activation: “PIV Card shall implement PIN-based cardholder activation in support of interoperability across departments and agencies. Other card activation mechanisms, only as specified in [SP 800-73], may be implemented and shall be discoverable.”**

**Suggestion: SCA Suggest that biometric match on card be included as a user-based cardholder activation mechanism and included in a future version of SP 800-73 and SP 800-116**



# Standards, document gaps

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## Line 1693- Authentication using CHUID:

**“The digital signature on the CHUID is checked to ensure the CHUID was signed by a trusted source and is unaltered. “**

## Suggestion:

**Align FIPS 201- 2 and SP800-73-3 Part 1 Appendix B by removing "Optional" from Figure B-2 diagram**



# Standards, document gaps

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## **Line 1693 – Authentication using CHUID:**

**“The digital signature on the CHUID is checked to ensure the CHUID was signed by a trusted source and is unaltered.”**

## **Suggestion:**

**Align FIPS 201-2 and GSA APL by remove Category Unsigned CHUID; adding CHUID Reader categories (signed CHUID)**



## Standards, document gaps

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**Line 1702 - Authentication using PIV Biometric:**

**“The PIV Card Application hosts the signed fingerprint templates and/or the signed iris image templates.”**

**Suggestion:**

**Align FIPS 2- and SP800-73-3 Part 1 Appendix B by removing "Optional" from Figure B-3 diagram.**



# Standards, document gaps

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**Line 1702 - Authentication using PIV Biometric:**

**“The PIV Card Application hosts the signed fingerprint templates and/or the signed iris image templates.”**

**Suggestion:**

**Align FIPS 201-2 and GSA APL by adding BIO signature check to biometric reader category, or alternatively remove the BIO Reader category.**



# Standards, document gaps

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**Line 1702 – Authentication using PIV Biometric:  
Using IRIS as alternative biometric modality.**

**Suggestion:**

- 1) For document consistency add process description and Characteristics section for BIO using IRIS.**
- 2) Add IRIS reader category to GSA APL.**



# Standards, document gaps

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## Section 6.2.3.2.

**GSA APL Approval procedures Biometric Authentication Reader Test Approval Procedures, section R-BIO-A.16 refers to SP800-78-2**

**Suggestion: Update to SP800-78-3**



# Standards, document gaps

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**Line 1800 - Authentication using On Card biometric comparison: GSA APL**

**No category for biometric Match On Card reader on GSA APL.**

**Suggestion:**

**Add match on card biometric reader category to GSA APL Evaluation program.**

**This should include reader output such as FASC-N, or UUID following successful positive match as input to Authorization mechanism.**



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